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9 Attorneys for Defendants LVMPD, Sgt. Crumrine, Ofc. Tran and Ofc. Flores

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ESTATE OF TASHI S. FARMER a/k/a
13 TASHII FARMER a/k/a TASHII BROWN,
14 by and through its Special Administrator,
15 Lorin Michelle Taylor; TAMARA BAYLEE
16 KUUMEALI'MAKAMAE FARMER
17 DUARTE, a minor, individually and as
18 Successor-in-Interest, by and through her
19 legal guardian, Stevandra Lk Kuanoni;
20 ELIAS BAY KAIMIPONO DUARTE, a
21 minor, individually and as Successor-in-
22 Interest, by and through his legal guardian,
23 Stevandra Lk Kuanoni,

24 Plaintiffs,

25 vs.

26 LAS VEGAS METROPOLITAN POLICE
27 DEPARTMENT, a political subdivision of
the State of Nevada; OFFICER KENNETH
LOPERA, individually and in his Official
Capacity; SERGEANT TRAVIS
CRUMRINE, individually and in his Official
Capacity; OFFICER MICHAEL TRAN,
individually and in his Official Capacity;
OFFICER MICHAEL FLORES, individually
and in his Official Capacity; and Does I
through 50 inclusive,

Defendants.

Case Number:

2:17-cv-01946-JCM-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE DISPOSITIVE
MOTIONS (FIRST REQUEST)**

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MARQUIS AURBACH COFFING

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1 Pursuant to LR IA 6-1, the parties, by and through their undersigned counsel of
2 record, hereby agree and jointly stipulate that the dispositive motion deadline in this case,
3 currently set for November 26, 2018, be extended an additional sixty-three (63) days up to
4 and including **Monday, January 28, 2019**. The following grounds constitute good cause
5 for granting this extension:

6 1. The parties conducted discovery including depositions up and until the
7 October 29, 2018 discovery cut-off.

8 2. Many of the deposition transcripts have not been received and are necessary
9 for the dispositive motion briefing. The parties understand that some transcripts will not be
10 complete until early/mid December.

11 3. All counsel have scheduling conflicts with the upcoming holidays that would
12 require various extensions with respect to the filing of responses and replies.

13 4. Plaintiffs' counsel has a scheduled honeymoon beginning on December 26,
14 2018 through January 12, 2019.

15 5. Rather than file dispositive motions and then extend the time for all
16 subsequent responsive pleadings, the parties believe that it is best to extend the dispositive
17 motion out until the end of January.

18 6. All parties agree that discovery is closed and all parties agree that no further
19 discovery will be conducted or attempted.

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1 This stipulation for an extension of time is also not sought for any improper purpose
2 or other purpose of delay, but in the interest of each party effectively representing their
3 clients at the dispositive motion stage.

4 Dated this 14th day of November, 2018.

5 MARQUIS AURBACH COFFING

ABIR COHEN TREYZON SALO LLP

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11 Attorney for Defendants LVMPD, Sgt.
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10 MCNUTT LAW FIRM, P.C.

11
12 By: s/Daniel R. McNutt
13 Daniel R. McNutt, Esq.
14 Nevada Bar No. 7815
15 625 South Eighth Street
16 Las Vegas, Nevada 89101
17 Attorney for Defendant Lopera

18 **ORDER**

19 IT IS HEREBY ORDERED that the dispositive motion deadline in this case,
20 currently set for November 26, 2018, be extended an additional sixty-three (63) days up to
21 and including Monday, January 28, 2019.

22 IT IS SO ORDERED this 16 day of November, 2018.

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24 United States Magistrate Judge